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Counsel for Plaintiff

DAVID CRAIG,

Plaintiff,

vs.

CITY OF LOS ANGELES, et al.,

Defendants.

) Case No.: 2:23-cv-06581-SVW-SSC

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PLAINTIFF’S EXHIBIT LIST

Pretrial Conference: August 18, 2025

Trial: August 26, 2025

Pursuant to Local Rule 16-6 and Rule 26(a)(3)(A)(iii) of the Federal Rules of Civil Procedure, Plaintiff David Craig (“Plaintiff”) submits his Exhibit List in advance of the Final Pretrial Conference. Because Defendant did not adequately meet and confer with Plaintiff pursuant to Local Rule 16-2 before the deadline to file the instant Exhibit List, Plaintiff submits this Exhibit List for himself which is substantially similar to Defendant’s Witness list. Plaintiff is awaiting further documents and information from Defendant in response to Plaintiffs’ discovery requests, and will amend this Witness List upon receipt of the additional responsive information.

No.	Description	Date Identified	Date Admitted
1	Plaintiff's TEAMS Report		
2	Plaintiff's Personnel Package		
3	2020 Police Captain Task Statements		
4	2020 Job Bulletins for Police Captain		
5	Eligible List for Police Captain dated 4-28-2021		
6	Plaintiff's Divisional Package		
7	Plaintiff's Payroll History		
8	Plaintiff's Organizations History		
9	Plaintiff's Complaint History		
10	Plaintiff's Military Information		
11	LAPD Military Liaison Officer Program Reference Guide		
12	Intradepartmental Correspondence regarding military service dated April 3, 2025		
13	Certification List in response to Requisition No. 21-00606 for POLICE CAPTAIN		

1	14	Certification List in response to Requisition No. 21-00856 for POLICE CAPTAIN		
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4	15	Certification List in response to Requisition No. 21-01116 for POLICE CAPTAIN		
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6				
7	16	Certification List in response to Requisition No. 22-00241 for POLICE CAPTAIN		
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10	17	Certification List in response to Requisition No. 22-00789 for POLICE CAPTAIN		
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14	18	Certification List in response to Requisition No. 22-01575 for POLICE CAPTAIN		
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17	19	Certification List in response to Requisition No. 22-02878 for POLICE CAPTAIN		
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20	20	Certification List in response to Requisition No. 23-00371 for POLICE CAPTAIN		
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23	21	Certification List in response to Requisition No. 23-01092 for POLICE CAPTAIN		
24				
25				
26	22	Complaint Investigation IA CF #23-002637		
27				
28				

1	23	Memorandum of		
2		Understanding No. 24,		
3		July 1, 2014 through June		
4		30, 2018*		
5	24	Memorandum of		
6		Understanding No. 24,		
7		August 1, 2019 through		
8		June 29, 2024*		
9	25	Memorandum of		
10		Understanding No. 24,		
11		July 2, 2023 through June		
12		26, 2027*		
13	26	LAPD Manual Volume 2		
14		Section 092.70		
15	27	Los Angeles Charter,		
16		Volume II, Article X,		
17		Section 1004		
18	28	Rules of the Board of		
19		Civil Service		
20		Commissioner, Rule 5		
21	29	Policies of Personnel		
22		Department, Section 13		
23	30	Policies of Personnel		
24		Department, Section 12		
25	31	Police Captain Class		
26		Specification		
27	32	Memorandum of		
28		Understanding No. 25,		
		August 1, 2019 through		
		September 4, 2027*		
	33	City of Los Angeles		
		Handbook for City		
		Employees, Revised		
		December 2019*		

1	34	Emails exchanged between David Craig, Julius Guay, Eric Quan, and other unknown recipients, on September 22, 2022 and September 23, 2022		
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3				
4				
5	35	Email from Kristin Humphris to Eric Quan dated July 25, 2025		
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7				
8	36-100	Reserved pending LAPD's production of further documents and responses pursuant to FRCP Rules 26, 37 and 56(d)		
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13 Because Defendant did not adequately meet and confer with Plaintiff pursuant to Local

14 Rule 16-2 before the deadline to file the instant Exhibit List; and because Defendant has failed

15 and refused to produce documents and information responsive to Plaintiff's discovery

16 requests, Plaintiff reserves the right to amend this Exhibit List at any time before the pretrial

17 conference.

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1 Dated: July 28, 2025

2 By: *s/ Brian J. Lawler*

3 Brian J. Lawler

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CERTIFICATE OF SERVICE

On July 28, 2025, I caused to be served upon counsel of record, at the address stated below, via electronic mail, a true and correct copy of the foregoing document.

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